From:Gray, DavidjTo:Webster, SusanCc:Gray, David

Subject: RE: Briefing Bullets - West

Date: Tuesday, April 23, 2013 9:37:48 AM

David J. Gray, P.E.
Office of Ecosystem Protection
Water Permits Branch
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577 eFax: 617.918.0577 gray.davidj@epa.gov

From: Webster, Susan

Sent: Thursday, April 18, 2013 2:50 PM

To: Coleman, Sam Cc: Gray, Davidj

Subject: Briefing Bullets - West

West Fertilizer Inc. Explosion, West, Texas

April 18, 2013 at 1330 CST

ASPECT:

Around midnight, CDT on April 17, EPA's Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft flew 21 runs over the incident site; data on the plume was available within 5 minutes. Readings were 6 to 10 part per million (ppm) by volume ammonia concentration within the plume, however, the plume dissipated rapidly due to high winds. Approximately ½ mile downwind, during the same runs, ASPECT did not detect ammonia.

People exposed to levels of ammonia above 30 ppm could experience notable discomfort or irritation. Ammonia is extremely pungent and inhaling ammonia can cause rapid onset of burning sensation in the eyes, nose and throat, but no lasting harm.

ASPECT is collecting photographic data as well as collecting additional data from the plume today (April 18).

Air Monitoring Efforts

EPA is currently conducting residential air monitoring to the south and east of facility. TCEQ is conducting air monitoring on-site and at the facility perimeter.

EPA Response Efforts

EPA has deployed 4 OSCs, 8 START contractors, 1 CID agent, and 1 PIO to the site to coordinate response efforts. TCEQ has not requested any additional response assistance at the site.

Governor Perry has requested a disaster declaration for McClennan County Texas.

State of Texas Operational Priorities:

- Search and Rescue
- Collect and disseminate accurate incident information to improve decision-making

RMP Historical Information:

Risk management plans are facility generated plans that describe their efforts to safely manage hazardous materials or chemicals to avoid impacts to the public.

The Risk Management Program is about reducing chemical risk at the local level. This information helps local fire, police, and emergency response personnel (who must prepare for and respond to chemical accidents), and is useful to citizens in understanding the chemical hazards in communities. EPA anticipates that making the RMPs available to the public stimulates communication between industry and the public to improve accident prevention and emergency response practices at the local level.

6SF conducted an inspection of the RMP at West Chemical and Fertilizer on March 16, 2006. Deficiencies identified included:

Failure to update its RMP in a timely manner. Due in 2004, didn't update until 2006.

Failure to document that hazards identified in the hazard review had been addressed.

Operating procedures failed to address consequences of deviation.

Poor employee training records.

Had not developed a formal written maintenance program.

The facility was fined \$2,300.00 on August 14, 2006. The facility self-certified that they had corrected issues.

Worst case release -54,000 lbs anhydrous ammonia released as a gas over 10 minutes with a distance to toxic endpoint of 1.5 miles. Population within a 1.5 mile circle is 2,500.

Alternative Release Scenario – Loss of 11,908 lbs of anhydrous ammonia from a transfer hose failure over 2 minutes with a distance to endpoint of 0.83 miles. Population within a 0.83 mile circle is 1,200.

The facility also reported the presence of 54,000 lbs of anhydrous ammonia on site within their Tier II report to the State of Texas.

Susan D. Webster, Chief Removal Section US Environmental Protection Agency Region 6 214.665.6784